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July 19, 1999

VIA MESSENGER

RECEIVED

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**Federal Communications Commission
Office of Secretary**

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: Ex Parte Presentation of CO Space Services, LLC, in the Matter of the Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98

Dear Ms. Salas:

On July 15, 1999, Gabe Cole, President of CO Space Services, LLC. ("CO Space"), and I met with Dorothy Attwood, legal advisor for Chariman Kennard, concerning the above-referenced proceeding. Mr. Cole stated that CO Space has, and is continuing to add, secure facilities that will house telecommunications, Internet, data processing, data storage and related equipment. CO Space intends to provide its customers with access to all major networks through either direct interconnection with providers or a fiber ring accessing incumbent and competitive carrier facilities. Mr. Cole provided some pictures and other information concerning CO Space and its facilities, which are attached hereto.

During the meeting, we discussed CO Space's view that the Commission should find that dark fiber is a national UNE. We emphasized that virtually every court and most state commissions to decide the matter have concluded that dark fiber is a network element. We stated that the opposite conclusion would be inconsistent with the well-accepted view that network elements may include dead copper and other parts of the network that are not currently in use.

We discussed that if the Commission finds that the local loop is a national UNE, it should certainly consider the dark fiber portion of the loop to be so as well. Given customer demands, more and more of the loop is becoming fiber, and thus over time more of the loop will be inaccessible if the Commission does not find that dark fiber is a national UNE. Similarly, if the Commission holds that the interoffice portion of the network is a national UNE, it should reach the same determination with respect to the dark fiber in that portion.

Arent Fox

Magalie Roman Salas, Esq.

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Mr. Cole explained that CO Space's business would be impaired without access to the incumbent LECs' dark fiber, which is critical for CO Space to provision competitive collocation and transport services to its customers. Alternative fiber providers' networks, to the extent they exist, in many jurisdictions are still under construction and face local regulatory approval delays. Even when these alternate fiber networks are deployed and operational, they will not come close to replicating the ubiquitous fiber network of the incumbent LEC's fiber network, particularly in the "last mile" between the incumbent LEC central office to the customer premises where alternative sources of dark fiber or other alternatives are unavailable for the fiberoptic bandwidth demanded by CO Space's customers.

If you have any questions concerning this filing, please contact me at (202) 857-6450.

Sincerely yours,



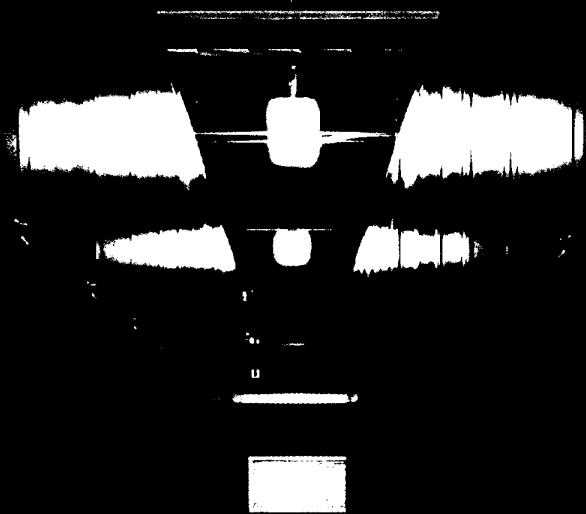
Alan G. Fishel

Counsel for CO Space Services, LLC.

Enclosures

cc: Janice M. Myles [Common Carrier Bureau, FCC 445 12th Street, S.W., Room 5-C327,
Washington, D.C. 20554] (w/encls.)(via messenger)
International Transcription Services [1231 20th Street, N.W., Washington, D.C. 20036]
(w/encls.) (via messenger)
Mr. G. Gabriel Cole

DEFINING COLLOCATION



CO
Space

www.cospaceservices.com

CO Space Advantage

CO Space provides high-quality facilities designed to house mission-critical telecommunications, Internet, data processing, data storage, and related equipment. Our goal is to provide our customers with a comprehensive offering that includes a range of options for critical space, interconnection, and technical operations services.

- **Plan and Integrate Equipment for Optimum Functioning**
- **Decrease Time-to-Market**
- **Minimize Capital Expenditures**
- **Increase Reliability and Security of Network Components**



w w w . c o s p a c e s e r v i c e s . c o m

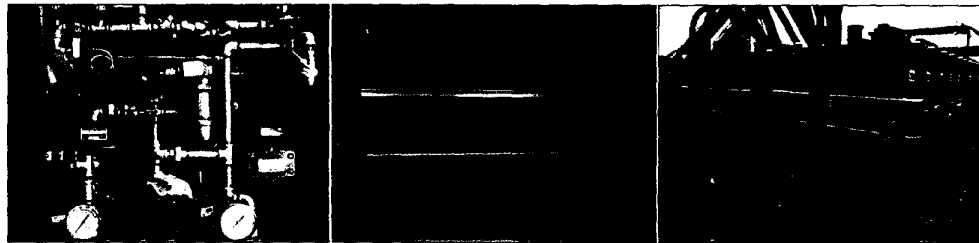
Critical Operations Facilities

We offer a range of spaces within our facilities, including common floor space, on which our customers can choose from pre-installed locking rack cabinets, 10 x 10 enclosed cubicles, or flex-caged floor space by the square foot; fully demised private space; and attached private office space.

Our facilities are designed from the ground up as a flexible, secure, and cost-effective environment to house a broad range of mission-critical equipment and provide the following controls*:

- fully conditioned power using Liebert UPS systems;
- back-up generation using Caterpillar diesel generators;
- fully redundant Liebert air-conditioning systems;
- Lucent dual-feed 48 V DC power plant;
- high level of power availability;
- pre-action and/or gas suppression fire systems;
- VESDA early-warning, combustion-detection systems;
- comprehensive, multi-level security protocols;
- 24 x 7 monitoring by trained professionals;
- detailed emergency-preparedness and disaster-recovery plans;
- interconnection/transport to major networks; and
- access to unbundled network elements.

*Satellite facilities may be monitored remotely



Technical Operations Services

CO Space provides a range of technical operations services, including the following:

Project Planning

Our project management team dedicates substantial time and effort up front with our customers to determine critical needs, set project schedules, and ensure that key requirements are met in an efficient manner. We are skilled at assisting our customers with equipment selection, installation, and commissioning.

Network Services

Our network services provide our customers with the following assistance in designing and implementing their networks:

- Interconnection Assistance
- Network Design
- Network Deployment
- Network Operations
- Network Monitoring

Operations Services

- Provisioning
- Maintenance
- Problem Resolution

w w w . c o s p a c e s e r v i c e s . c o m

CO Space Markets

We are developing our critical operations facilities and related services in multiple markets throughout the U.S. in 1999, and we will expand our locations to include additional U.S. markets, Canada, and Western Europe in 2000.

CO Space builds out two types of facilities, each of which is consistently designed across markets: CO Space's primary facilities are, typically, 20,000 to 25,000 square feet and are able to support installations ranging from 25 to 5,000 square feet; CO Space's satellite facilities are, typically, 5,000 to 7,000 square feet and are able to support installations ranging from 25 to 1,500 square feet.

1999 Markets

Boston, Massachusetts

Weehawken, New Jersey

Waltham, Massachusetts*

Houston, Texas

Los Angeles, California

Chicago, Illinois

New York, New York

Atlanta, Georgia

San Francisco, California

Miami, Florida

*Denotes Satellite Facility



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